

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
(CENTRAL DIVISION)

In re:

SOUTHERN SKY AIR & TOURS, LLC,
d/b/a DIRECT AIR,

Debtor.

Chapter 7
Case No. 12-40944-MSH

ATTORNEY'S AFFIDAVIT

STATE OF FLORIDA)

COUNTY OF DUVAL)

ss.:

Robert M. Dees, being duly sworn, deposes and says:

1. I am an attorney at law admitted to practice in the State of Florida, the Eleventh Circuit Court of Appeals, and the Middle District, Southern District, and Northern District Federal Courts in Florida. I am an attorney with a principal business location of Milam, Howard, Nicandri, Dees & Gillam, P.A. ("Milam Howard"), 14 East Bay Street, Jacksonville, Florida 32202 and am a qualified person to perform the services described in the Trustee's Application for Authority to Employ Special Counsel (the "Application to Employ").

2. Neither I, nor any member or associate of my firm, holds or represents any interest adverse to that of the estate in the matters upon which said law firm is to be engaged. Thus, I believe I am a "disinterested person" within the meaning of § 101(14) of the Bankruptcy Code. Milam Howard has represented the Debtor in *Arrow Energy, Inc. v. Aviation Fuel International, Inc., et al*, in the Seventeenth Judicial Circuit, in and for Broward County, Florida, Case No.: 2010-48678 CACE (the "Arrow Matter") and *Kenneth Forrey v. Casino Direct Air*,

LLC, *et al.*, in the Sixth Judicial Circuit, in and for Pinellas County, Florida, Case No.: 09-3102-CI-07 (the "Forrey Matter"). The Arrow Matter is a garnishment action in which a judgment in the amount of \$325,138.97 was entered against the Debtor based upon an amount the debtor purportedly owed to Aviation Fuel International ("AFI"). Arrow obtained a judgment in the amount of \$313,036.08 against AFI and served a writ of garnishment on the Debtor. During the garnishment proceedings, the Debtor became aware that it did not owe money to AFI. However, the trial court nevertheless entered a garnishment judgment against the Debtor. The garnishment judgment is currently on appeal to the Fourth District Court of Appeal. Our initial brief was served on January 26, 2012. Arrow's answer brief was served on May 8, 2012 and our reply brief is due on June 4, 2012.

The Forrey Matter was a personal injury action in which the defendant Signature Flight Support Corporation filed a third-party complaint against the Debtor based upon an indemnification clause in a contract. The Forrey matter was settled between the plaintiff and Defendant.

Milam Howard represented the Debtor in both matters for an hourly fee of \$270.00.

3. I have agreed to represent Joseph H. Baldiga, Chapter 7 trustee of the bankruptcy estate of Southern Sky Air & Tours, LLC, d/b/a Direct Air, on a contingency fee basis, at the rate of 20% of any recovery before an order is issued in the Appeal Action (as defined in the Application to Employ); 30% if resolved after an order is issued in the Appeal Action, but prior to determination at the trial court level as to whether, in fact, the Debtor owed AFI anything and, if so, how much and to what extent, if any, Arrow's garnishment was appropriate; and 40% if resolved (via settlement or litigation) after determination by the trial court as to what AFI owed

the Debtor and the appropriateness of Arrow's garnishment, or, if greater, the amount awarded by the trial court and approved by the Bankruptcy Court, plus 100% of reasonable expenses, by my representation as special counsel.

4. Since the Debtor was considerably behind in paying its legal fees, Milam Howard, in November, 2011, refused to perform any more work until the past due amounts were paid. In December, the Debtor asked if Milam Howard would prepare the initial brief on appeal if it made a \$10,000.00 payment by December 31, 2011. Milam Howard agreed to those terms. The Debtor made a \$10,000.00 payment on January 3, 2012, and Milam Howard prepared the initial brief.

5. After receipt of payments referred to in Paragraph 4, Milam Howard provided additional legal services prior to the petition date, totaling \$7,739.47. Inclusive of that amount, as of the Debtor's March 15, 2012 Chapter 11 petition date, Milam Howard was owed \$48,350.31 in legal fees and expenses. Conditional on the Trustees' acceptance (and the Bankruptcy Court's approval) of this special counsel employment agreement, Milam Howard agrees to waive any claim for unpaid prepetition fees and expenses. Copies of Milam Howard's billings in the referenced matter are attached.

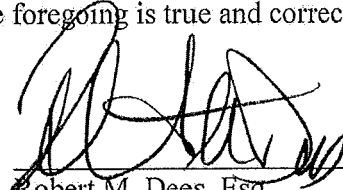
6. I shall amend this statement immediately upon my learning that (a) any of the within representations are incorrect or (b) there is any change of circumstances relating thereto.

7. I have reviewed the provisions of MLBR 2016-1.

8. I have read the Application which this affidavit accompanies and, to the best of my knowledge, information and belief, the contents of said Application are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 23, 2012



Robert M. Dees, Esq.

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.
14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
July 31, 2010
Client Matter No: 1639-101M
Statement No: 143946

Attn: Kay Ellison

Forrey v. Southern Sky

Fees

			Rate	Hours	
06/28/2010	PMR	Telephone conference with R. Boyd; conference with R. Boyd and Lee Ann Moe regarding case.	275.00	1.20	330.00
06/29/2010	PMR	Telephone conference with co-counsel regarding possible defenses to contractual indemnity claim.	275.00	0.20	55.00
07/01/2010	PMR	Correspondence from and to former counsel regarding documents pertaining to our case.	275.00	0.10	27.50
07/19/2010	PMR	Review correspondence from co-counsel; prepare and file Notice of Appearance and correspondence to co-counsel regarding same.	275.00	0.30	82.50
		For Current Services Rendered		1.80	495.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Paul M. Renner	1.80	\$275.00	\$495.00

Expenses

Photocopy charges	1.20
Postage	1.32
Total Expenses Through 07/31/2010	2.52
Total Current Work	497.52

Southern Sky Air & Tours, LLC

Page: 2

July 31, 2010

Client Matter No: 1639-101M

Statement No: 143946

Forrey v. Southern Sky

Payments

07/31/2010	Client Fund Payment.	-497.52
------------	----------------------	---------

	Balance Due	<u>\$0.00</u>
--	-------------	---------------

Client Funds

07/31/2010	Retainer (Check 1856)	5,000.00
------------	-----------------------	----------

07/31/2010	Client Fund Payment.	-497.52
------------	----------------------	---------

	Ending Client Funds Balance	<u>\$4,502.48</u>
--	-----------------------------	-------------------

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.
14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
September 30, 2010
Client Matter No: 1639-101M
Statement No: 144935

Attn: Kay Ellison

Forrey v. Southern Sky

Fees

			Rate	Hours	
09/01/2010	PMR	Receipt of Notice of Depositions and correspondence to client regarding same.	275.00	0.20	55.00
		For Current Services Rendered		0.20	55.00
		Recapitulation			
	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>		<u>Total</u>
	Paul M. Renner	0.20	\$275.00		\$55.00

Expenses

Tolls/Taxi/Auto Rental	102.65
Long distance telephone charges	5.66
Airfare	273.40
Total Expenses Through 09/30/2010	381.71
Total Current Work	436.71

Payments

09/30/2010	Client Fund Payment.	-436.71
	Balance Due	<u>\$0.00</u>

Southern Sky Air & Tours, LLC

Page: 2
September 30, 2010
Client Matter No: 1639-101M
Statement No: 144935

Forrey v. Southern Sky

Client Funds

09/30/2010	Beginning Client Funds Balance	\$4,502.48
	Client Fund Payment.	<u>-436.71</u>
	Ending Client Funds Balance	\$4,065.77

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.
14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
October 31, 2010
Client Matter No: 1639-101M
Statement No: 145383

Attn: Kay Ellison

Forrey v. Southern Sky

Fees

			Rate	Hours	
10/01/2010	PMR	Telephone conference with general counsel R. Boyd regarding upcoming depositions.	275.00	0.10	27.50
10/04/2010	PMR	Research regarding indemnity provisions.	275.00	1.50	412.50
10/05/2010	PMR	Prepare for and attend deposition of B. Burling; telephone conference with general counsel R. Boyd regarding same and litigation strategy; telephone conference with client regarding outcome of deposition; meet with former counsel to obtain additional documents pertinent to the case.	275.00	8.00	2,200.00
10/19/2010	PMR	Telephone conference with counsel for Signature; prepare litigation analysis for client.	275.00	0.90	247.50
10/28/2010	PMR	Correspondence from Plaintiff's counsel regarding mediation; correspondence to C. Cloud regarding mediators to select.	275.00	0.80	220.00
10/29/2010	PMR	Revise correspondence to client; telephone conference with general counsel R. Boyd.	275.00	0.90	247.50
		For Current Services Rendered		12.20	3,355.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Paul M. Renner	12.20	\$275.00	\$3,355.00

Advances

Online legal research	25.00
-----------------------	-------

Southern Sky Air & Tours, LLC

Page: 2

October 31, 2010

Client Matter No: 1639-101M

Statement No: 145383

Forrey v. Southern Sky

Total Advances Through 10/31/2010	25.00
-----------------------------------	-------

Total Current Work	3,380.00
--------------------	----------

Payments

10/31/2010	Client Fund Payment.	-3,380.00
------------	----------------------	-----------

Balance Due	<u>\$0.00</u>
-------------	---------------

Client Funds

10/31/2010	Beginning Client Funds Balance	\$4,065.77
	Client Fund Payment.	<u>-3,380.00</u>
	Ending Client Funds Balance	\$685.77

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.

14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Attn: Kay Ellison

Page: 1
November 30, 2010
Client Matter No: 1639-101M
Statement No: 145946

Forrey v. Southern Sky

Fees

			Rate	Hours	
11/04/2010	PMR	Correspondence from C. Cloud regarding mediation; contact with counsel for Plaintiff regarding mediation schedule.	275.00	0.40	110.00
11/05/2010	PMR	Correspondence from and to counsel for signature regarding mediation.	275.00	0.30	82.50
11/09/2010	PMR	Correspondence to client regarding mediation; correspondence to R. Boyd regarding scheduling issues pertaining to mediation.	275.00	0.50	137.50
11/10/2010	PMR	Prepare affidavit for J. Tull; correspondence to and from client regarding mediation.	275.00	1.00	275.00
11/16/2010	PMR	Review Motion for Summary Judgment filed by Signature and basis for same; review parties' contract to identify new grounds for our Motion for Summary Judgment.	275.00	1.00	275.00
11/17/2010	PMR	Review contract and formulate new grounds for summary judgment; correspondence to R. Boyd regarding same.	275.00	1.50	412.50
11/22/2010	PMR	Prepare our Motion for Summary Judgment.	275.00	2.50	687.50
11/24/2010	PMR	Attention to dates for mediation.	275.00	0.20	55.00
		For Current Services Rendered		7.40	2,035.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Paul M. Renner	7.40	\$275.00	\$2,035.00

Southern Sky Air & Tours, LLC

Page: 2

November 30, 2010

Client Matter No: 1639-101M

Statement No: 145946

Forrey v. Southern Sky

Expenses

Long distance telephone charges 12.28

Total Expenses Through 11/30/2010 12.28

Total Current Work 2,047.28

Payments

11/30/2010 Client Fund Payment. -685.77

Balance Due \$1,361.51

Client Funds

11/30/2010 Beginning Client Funds Balance \$685.77

Client Fund Payment. -685.77

Ending Client Funds Balance \$0.00

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.

14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
December 31, 2010
Client Matter No: 1639-101M
Statement No: 146375

Attn: Kay Ellison

Forrey v. Southern Sky

Fees

			Rate	Hours	
12/02/2010	PMR	Communication to and from co-counsel and with court mediation coordinator regarding prospective mediation dates.	275.00	0.40	110.00
12/14/2010	PMR	Prepare Motion for Summary Judgment on all three counts raised by Signature.	275.00	1.50	412.50
12/16/2010	PMR	Prepare Motion for Summary Judgment to include arguments against Equitable Subrogation.	275.00	1.00	275.00
12/20/2010	PMR	Prepare Motion for Summary Judgment on all counts of Signature's Complaint and identify case law to support same.	275.00	3.50	962.50
12/21/2010	PMR	Revisions to Motion for Summary Judgment.	275.00	0.50	137.50
12/27/2010	RMD	Review Defendant's Motion for Partial Summary Judgment; begin preparation of Motion for Summary Judgment.	250.00	1.00	250.00
		For Current Services Rendered		7.90	2,147.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	1.00	\$250.00	\$250.00
Paul M. Renner	6.90	275.00	1,897.50

Advances

Online legal research	31.20
Total Advances Through 12/31/2010	31.20

Southern Sky Air & Tours, LLC

Page: 2
December 31, 2010
Client Matter No: 1639-101M
Statement No: 146375

Forrey v. Southern Sky

Total Current Work	2,178.70
Previous Balance	\$1,361.51
Balance Due	<u>\$3,540.21</u>

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.
14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
January 31, 2011
Client Matter No: 1639-101M
Statement No: 146819

Attn: Kay Ellison

Forrey v. Southern Sky

Fees

		Rate	Hours	
01/27/2011	RMD Preparation of Motion for Summary Judgment.	250.00	1.00	250.00
01/28/2011	RMD Preparation of Motion for Summary Judgment; review pleadings.	250.00	2.30	575.00
01/31/2011	RMD Preparation of Motion for Summary Judgment.	250.00	0.80	200.00
	For Current Services Rendered		4.10	1,025.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	4.10	\$250.00	\$1,025.00

Advances

Online legal research	61.31
Total Advances Through 01/31/2011	61.31
Total Current Work	1,086.31
Previous Balance	\$3,540.21
Balance Due	<u>\$4,626.52</u>

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.
14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
February 28, 2011
Client Matter No: 1639-101M
Statement No: 156960

Attn: Kay Ellison

Forrey v. Southern Sky

Fees

		Rate	Hours	
02/07/2011	RMD Review pleadings; begin preparation of Motion for Summary Judgment.	250.00	2.10	525.00
02/10/2011	RMD Research and preparation of Motion for Summary Judgment.	250.00	2.20	550.00
02/11/2011	RMD Review file; preparation of affidavit of J. Hull; preparation of Motion for Summary Judgment.	250.00	2.80	700.00
02/22/2011	RMD Telephone conference with R. Boyd; preparation for mediation.	250.00	0.70	175.00
02/23/2011	RMD Preparation for hearing on our Motion for Summary Judgment.	250.00	0.80	200.00
02/24/2011	RMD E-mails with R. Boyd; telephone conference with R. Boyd; e-mail with J. Tull; preparation for mediation.	250.00	1.60	400.00
02/25/2011	RMD Preparation for and attendant at mediation in St. Petersburg.	250.00	4.80	1,200.00
	For Current Services Rendered		15.00	3,750.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	15.00	\$250.00	\$3,750.00

Expenses

Tolls/Taxi/Auto Rental	102.39
Long distance telephone charges	23.96

Southern Sky Air & Tours, LLC

Page: 2

February 28, 2011

Client Matter No: 1639-101M

Statement No: 156960

Forrey v. Southern Sky

Postage	4.68
Airfare	<u>301.40</u>
Total Expenses Through 02/28/2011	432.43
 Total Current Work	 4,182.43
 Previous Balance	 \$4,626.52
 Balance Due	 <u>\$8,808.95</u>

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.

14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Attn: Kay Ellison

Page: 1
March 31, 2011
Client Matter No: 1639-101M
Statement No: 157345

Forrey v. Southern Sky

Fees

		Rate	Hours	
03/01/2011	RMD Preparation for hearing on signature's Motion for Summary Judgment; receipt and review of Signature's Motion to Compel.	250.00	1.50	375.00
03/02/2011	RMD E-mails with R. Boyd; preparation of exhibits for summary judgment hearing; research for summary judgment hearing.	250.00	2.60	650.00
03/03/2011	RMD Preparation for and attendance at hearing on Signature and Southern Sky's Cross Motions for Summary Judgment; receipt and review of Hartford insurance policy; e-mails with R. Boyd.	250.00	6.70	1,675.00
03/07/2011	RMD Receipt and review of Hartford insurance policy; e-mails with Signature's attorney; telephone conferences with Signatures's attorney.	250.00	1.40	350.00
03/10/2011	RMD Telephone conference with Signature's attorney.	250.00	0.40	100.00
03/11/2011	RMD E-mails with Signature's attorney; telephone conference with R. Boyd; e-mails with R. Boyd.	250.00	1.00	250.00
03/14/2011	RMD E-mail with R. Boyd; preparation for mediation.	250.00	1.10	275.00
03/15/2011	RMD Preapration for and attendance at mediation conference; e-mails with R. Boyd.	250.00	5.60	1,400.00
03/16/2011	RMD Telephone conference with R. Boyd.	250.00	0.20	50.00
03/17/2011	RMD Receipt and review of Order granting Signature's Motion for			

Page: 2

Southern Sky Air & Tours, LLC

March 31, 2011

Client Matter No: 1639-101M

Statement No: 157345

Forrey v. Southern Sky

			Rate	Hours	
		Summary Judgment; e-mails with R. Boyd.	250.00	0.50	125.00
03/18/2011	RMD	E-mails with R. Boyd.	250.00	0.30	75.00
03/22/2011	PEN	Work on Counterclaim and pleading issues with R. Dees.	250.00	0.40	100.00
	RMD	Telephone conferences with R. Boyd; e-mails with R. Boyd; research for Motion for Reconsideration; review file regarding Bankers Insurance policy.	250.00	2.20	550.00
03/24/2011	RMD	Receipt and review of Banker's Insurance policy; e-mail with R. Boyd.	250.00	0.60	150.00
For Current Services Rendered				24.50	6,125.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Peter E. Nicandri	0.40	\$250.00	\$100.00
Robert M. Dees	24.10	250.00	6,025.00

Expenses

Tolls/Taxi/Auto Rental	175.73
Overnight Delivery	21.79
Overnight Delivery	12.98
Long distance telephone charges	100.04
Airfare	622.80
Parking	28.00
Total Expenses Through 03/31/2011	961.34

Advances

Online legal research	62.07
Total Advances Through 03/31/2011	62.07

Total Current Work 7,148.41

Previous Balance \$8,808.95

Payments

03/07/2011	Fee Payment	-1,361.51
03/14/2011	Advance Payment	-31.20
03/14/2011	Fee Payment	-2,116.30
	Total Payments	-3,509.01

Southern Sky Air & Tours, LLC

Page: 3

March 31, 2011

Client Matter No: 1639-101M

Statement No: 157345

Forrey v. Southern Sky

Balance Due

\$12,448.35

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.
14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
April 30, 2011
Client Matter No: 1639-101M
Statement No: 157863

Attn: Kay Ellison

Forrey v. Southern Sky

Fees

		Rate	Hours	
04/04/2011	RMD Research for Motion Reconsideration including cases from other states holding that an Indemnification Clause cannot be incorporated by reference; research issue on whether a Hold Harmless Clause applies to liability assumed by contract.	250.00	4.20	1,050.00
04/06/2011	RMD Telephone conference with with Plaintiff's attorney; telephone conference with Signature's attorney.	250.00	0.50	125.00
04/08/2011	RMD Telephone conference with Signature's attorney.	250.00	0.30	75.00
04/11/2011	RMD Additional research in preparation of Motion for Reconsideration; telephone conference with Plaintiff's attorney; telephone conference with Signature's attorney; emails with R. Boyd.	250.00	1.10	275.00
04/12/2011	RMD Further research for Motion for Rehearing.	250.00	1.70	425.00
04/13/2011	RMD Research in preparation of Motion for Rehearing.	250.00	1.30	325.00
04/14/2011	RMD Telephone conference with R. Boyd.	250.00	0.20	50.00
04/19/2011	RMD Telephone conference with with Signature's attorney.	250.00	0.40	100.00
04/21/2011	RMD Receipt and review of of letter from Signature's attorney.	250.00	0.20	50.00
04/25/2011	RMD Receipt and review of letter from Signature's attorney.	250.00	0.20	50.00
04/27/2011	RMD Telephone conference with Signature's attorney.	250.00	0.30	75.00
	For Current Services Rendered		10.40	2,600.00

Southern Sky Air & Tours, LLC

Page: 2

April 30, 2011

Client Matter No: 1639-101M

Statement No: 157863

Forrey v. Southern Sky

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	10.40	\$250.00	\$2,600.00

Expenses

Long distance telephone charges	4.58
Total Expenses Through 04/30/2011	4.58

Advances

Online legal research	99.59
Austin, Ley, Roe & Patsko, P.A. - Inv. 616422	166.67
Total Advances Through 04/30/2011	266.26

Total Current Work	2,870.84
--------------------	----------

Previous Balance	\$12,448.35
------------------	-------------

Payments

04/29/2011	Fee Payment	-31.20
04/29/2011	Fee Payment	-1,025.00
04/29/2011	Advance Payment	-61.31
	Total Payments	-1,117.51
	Balance Due	<u>\$14,201.68</u>

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.

14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Attn: Kay Ellison

Page: 1
May 31, 2011
Client Matter No: 1639-101M
Statement No: 158266

Forrey v. Southern Sky

Fees

		Rate	Hours	
05/11/2011	RMD Receipt and review of Signature's Interrogatories to Plaintiff.	250.00	0.30	75.00
	For Current Services Rendered		0.30	75.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	0.30	\$250.00	\$75.00

Total Current Work 75.00

Previous Balance \$14,201.68

Balance Due \$14,276.68

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.

14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Faesimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
June 30, 2011
Client Matter No: 1639-101M
Statement No: 158824

Attn: Kay Ellison

Forrey v. Southern Sky

Previous Balance	\$14,276.68
------------------	-------------

Balance Due	<u>\$14,276.68</u>
-------------	--------------------

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.

14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
July 31, 2011
Client Matter No: 1639-101M
Statement No: 159220

Attn: Kay Ellison

Forrey v. Southern Sky

Fees

		Rate	Hours	
07/11/2011	RMD Receipt and review of supplemental Interrogatories.	250.00	0.20	50.00
07/19/2011	RMD Telephone conference with R. Boyd; review file.	250.00	0.40	100.00
07/21/2011	RMD Telephone conference with R. Boyd.	250.00	0.30	75.00
	For Current Services Rendered		0.90	225.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	0.90	\$250.00	\$225.00

Total Current Work 225.00

Previous Balance \$14,276.68

Balance Due \$14,501.68

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.

14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
August 31, 2011
Client Matter No: 1639-101M
Statement No: 159632

Attn: Kay Ellison

Forrey v. Southern Sky

Fees

		Rate	Hours	
08/09/2011	RMD Receipt and review of Signature's answers to interrogatories.	250.00	0.30	75.00
	For Current Services Rendered		0.30	75.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	0.30	\$250.00	\$75.00

Expenses

Long distance telephone charges	1.80
Total Expenses Through 08/31/2011	1.80
Total Current Work	76.80
Previous Balance	\$14,501.68
Balance Due	<u>\$14,578.48</u>

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.

14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Attn: Kay Ellison

Page: 1
September 30, 2011
Client Matter No: 1639-101M
Statement No: 160241

Forrey v. Southern Sky

Fees

		Rate	Hours	
09/07/2011	RMD Telephone conference with Plaintiff's attorney.	250.00	0.20	50.00
09/08/2011	RMD Telephone conference with R. Boyd; receipt and review of letter from Plaintiff's attorney.	250.00	0.40	100.00
	For Current Services Rendered		0.60	150.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	0.60	\$250.00	\$150.00

Expenses

Long distance telephone charges	58.20
Total Expenses Through 09/30/2011	58.20
Total Current Work	208.20
Previous Balance	\$14,578.48

Payments

09/14/2011	Advance Payment	-62.07
09/14/2011	Expense Payment	-961.34
09/14/2011	Fee Payment	-5,422.65
	Total Payments	-6,446.06
	Balance Due	<u>\$8,340.62</u>

Southern Sky Air & Tours, LLC

Page: 2

September 30, 2011

Client Matter No: 1639-101M

Statement No: 160241

Forrey v. Southern Sky

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.
14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
October 31, 2011
Client Matter No: 1639-101M
Statement No: 160587

Attn: Kay Ellison

Forrey v. Southern Sky

Expenses

Long distance telephone charges	2.91
Photocopy charges	2.40
Postage	<u>1.32</u>
Total Expenses Through 10/31/2011	6.63
 Total Current Work	 6.63
 Previous Balance	 \$8,340.62
 Balance Due	 <u><u>\$8,347.25</u></u>

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.

14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
November 30, 2011
Client Matter No: 1639-101M
Statement No: 160958

Attn: Kay Ellison

Forrey v. Southern Sky

Fees

			Rate	Hours	
11/09/2011	RMD	Attendance at case management conference.	250.00	1.00	250.00
	HD	Review file and discovery and provide case status update for case management conference with Court.	125.00	1.00	125.00
11/21/2011	RMD	Research nationwide for cases on incorporation by reference of indemnification clause.	250.00	1.60	400.00
		For Current Services Rendered		3.60	775.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	2.60	\$250.00	\$650.00
Heather Durham	1.00	125.00	125.00

Expenses

Overnight Delivery	13.39
Overnight Delivery	13.63
Long distance telephone charges	35.39
Total Expenses Through 11/30/2011	62.41

Advances

Processor fee	459.00
Total Advances Through 11/30/2011	459.00
Total Current Work	1,296.41

Southern Sky Air & Tours, LLC

Page: 2

November 30, 2011

Client Matter No: 1639-101M

Statement No: 160958

Forrey v. Southern Sky

Previous Balance	\$8,347.25
------------------	------------

Payments

11/30/2011	Fee Payment	-75.00
11/30/2011	Expense Payment	-432.43
11/30/2011	Advance Payment	-266.26
11/30/2011	Expense Payment	-4.58
11/30/2011	Expense Payment	-1.80
11/30/2011	Expense Payment	-58.20
11/30/2011	Expense Payment	-6.63
11/30/2011	Fee Payment	-2,155.10

Total Payments	-3,000.00
----------------	-----------

Balance Due	<u>\$6,643.66</u>
-------------	-------------------

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.

14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
December 31, 2011
Client Matter No: 1639-101M
Statement No: 161333

Attn: Kay Ellison

Forrey v. Southern Sky

Fees

		Rate	Hours	
12/02/2011	RMD Receipt and review of Order referring case to mediation; receipt and review of trial Order.	250.00	0.40	100.00
12/05/2011	RMD Telephone conference with Signature's attorney.	250.00	0.20	50.00
12/06/2011	RMD Receipt and review of letter from Signature's attorney.	250.00	0.20	50.00
	For Current Services Rendered		0.80	200.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	0.80	\$250.00	\$200.00

Expenses

Long distance telephone charges	23.17
Total Expenses Through 12/31/2011	23.17
Total Current Work	223.17
Previous Balance	\$6,643.66
Balance Due	<u>\$6,866.83</u>

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.

14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
January 31, 2012
Client Matter No: 1639-101M
Statement No: 161657

Attn: Kay Ellison

Forrey v. Southern Sky

Fees

			Rate	Hours	
01/03/2012	PMR	Correspondence to client regarding mediation dates and case status; telephone conference with R. Boyd regarding same.	275.00	0.50	137.50
01/04/2012	PMR	Review new rule pertaining to mediation and draft Certificate of Authority for Mediation; telephone conference with co-counsel, R. Boyd.	275.00	0.90	247.50
01/05/2012	PMR	Revise correspondence to client to include new requirement for Certificate of Authority.	275.00	0.20	55.00
01/17/2012	PMR	Telephone conference with R. Boyd; correspondence to all counsel requesting consent to allow R. Boyd to act as party representative.	275.00	0.50	137.50
01/20/2012	PMR	Telephone conference with R. Boyd; correspondence to client.	275.00	0.50	137.50
01/23/2012	PMR	Revise correspondence to client regarding mediation; conference with R. Dees regarding potential strategy for mediation; correspondence from Defendant objecting to R. Boyd appearing at mediation; telephone conference with R. Boyd regarding client meetings regarding mediation.	275.00	1.70	467.50
01/24/2012	PMR	Telephone conference with R. Boyd regarding non-response from client to upcoming mediation and Defendant's objection to his appearance at mediation.	275.00	0.20	55.00
01/26/2012	PMR	Telephone conference with attorneys for Plaintiff and Defendant regarding mediation.	275.00	0.50	137.50
	PMR	Prepare Motion to Reset Mediation.	275.00	0.50	137.50

Southern Sky Air & Tours, LLC

Page: 2

January 31, 2012

Client Matter No: 1639-101M

Statement No: 161657

Forrey v. Southern Sky

		Rate	Hours	
01/27/2012	PMR Telephone conference with counsel for Signature regarding their objection to reset the mediation; telephone conference with mediator regarding same and consent to appear telephonically; draft correspondence to opposing counsel regarding same; correspondence to and conference call with client regarding attendance at mediation.	275.00	1.50	412.50
01/30/2012	PMR Telephone conference with opposing counsel; telephone conference with mediator; correspondence with client regarding corporate representative and settlement; prepare for mediation including mediation statement.	275.00	3.40	935.00
01/31/2012	RMD Assist with mediation.	250.00	0.50	125.00
	PMR Prepare for, travel to and from, and attend successful mediation of Forrey's main case.	275.00	14.00	3,850.00
	For Current Services Rendered		24.90	6,835.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	0.50	\$250.00	\$125.00
Paul M. Renner	24.40	275.00	6,710.00

Expenses

Overnight Delivery	14.15
Long distance telephone charges	36.66
Photocopy charges	5.60
Postage	6.02
Total Expenses Through 01/31/2012	62.43

Advances

Clerk of Court	78.50
Robert J. Lancaster, Esq. - Mediation Fee, Inv. 13112	795.00
Total Advances Through 01/31/2012	873.50

Total Current Work	7,770.93
--------------------	----------

Previous Balance	\$6,866.83
------------------	------------

Balance Due	<u>\$14,637.76</u>
-------------	--------------------

Southern Sky Air & Tours, LLC

Page: 3

January 31, 2012

Client Matter No: 1639-101M

Statement No: 161657

Forrey v. Southern Sky

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.
14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
February 29, 2012
Client Matter No: 1639-101M
Statement No: 162128

Attn: Kay Ellison

Forrey v. Southern Sky

Fees

			Rate	Hours	
01/03/2012	HD	Preparation of Notice to Court regarding supplementation of record.	125.00	0.50	62.50
02/01/2012	PMR	Review Settlement terms; conference with R. Dees regarding strategy to build record for appeal including possible affidavit for J. Tull; telephone conference with mediator regarding status of settlement.	275.00	1.00	275.00
02/02/2012	PMR	Telephone conference with counsel for Signature confirming Plaintiff's final acceptance of settlement and that they will begin first draft of agreement; correspondence to client regarding same; telephone conference with counsel for Signature reconfirming agreed terms for written Settlement Agreement.	275.00	0.60	165.00
02/06/2012	PMR	Telephone conference with counsel for Signature regarding status of Settlement Agreement.	275.00	0.20	55.00
02/08/2012	PMR	Review Release by Forrey to settle main claim and revisions to same; review proposed terms of agreement between Signature and Southern; telephone conference with opposing counsel regarding same.	275.00	1.50	412.50
02/10/2012	PMR	Review revised release and Letter Agreement from Signature; correspondence to client regarding same.	275.00	0.50	137.50
02/14/2012	PMR	Correspondence to client regarding Settlement Agreement.	275.00	0.30	82.50
02/15/2012	RMD	Preparation of proposal for settlement.	250.00	0.20	50.00

Southern Sky Air & Tours, LLC

Page: 2

February 29, 2012

Client Matter No: 1639-101M

Statement No: 162128

Forrey v. Southern Sky

			Rate	Hours	
02/16/2012	PMR	Revise proposal for settlement; correspondence to client regarding same.	275.00	0.60	165.00
02/22/2012	PMR	Correspondence to client regarding settlement, trial deadlines, and proposal for settlement; review upcoming trial deadlines.	275.00	0.50	137.50
02/27/2012	PMR	Telephone conference with counsel for Signature regarding status of settlement; correspondence to and from client regarding same.	275.00	0.40	110.00
02/28/2012	PMR	Conference call with client regarding Settlement Agreement, Forrey payment and claims by Signature and negotiation strategy for same.	275.00	0.50	137.50
		For Current Services Rendered		6.80	1,790.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	0.20	\$250.00	\$50.00
Paul M. Renner	6.10	275.00	1,677.50
Heather Durham	0.50	125.00	62.50

Expenses

Long distance telephone charges	15.70
Total Expenses Through 02/29/2012	15.70
Total Current Work	1,805.70
Previous Balance	\$14,637.76
Balance Due	<u>\$16,443.46</u>

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.
14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
March 31, 2011
Client Matter No: 1639-102M
Statement No: 157346

Attn: Kay Ellison

Arrow Energy, Inc. (Garnishment)

Fees

		Rate	Hours	
03/10/2011	RMD E--mails with R. Boyd; review pleadings & docket in Michigan case filed by Arrow against AFI; e-mails with R. Boyd; telephone conferences with R. Boyd; receipt and review of correspondence with AFI's attorney; research garnishment issues.	250.00	2.10	525.00
03/14/2011	RMD Preparation of Answer to writ of garnishment.	250.00	1.20	300.00
03/16/2011	RMD Telephone conference with R. Boyd; preparation of garnishment Answer.	250.00	1.00	250.00
03/17/2011	RMD Preparation of proposed garnishment Answer; e-mails with R. Boyd.	250.00	0.70	175.00
03/21/2011	RMD Preparation of Answer to writ of garnishment; preparation of Motion to Prevent Retaliation by AFI for Southern Sky complying with writ of garnishment; conference call with K. Ellison and J. Tull.	250.00	2.20	550.00
03/22/2011	RMD Telephone conferences with R. Boyd; e-mails with R. Boyd; conference call with K. Ellison and J. Tull; receipt and review of spreadsheets.	250.00	1.70	425.00
03/23/2011	RMD Telephone conference with R. Boyd; e-mails with R. Boyd; receipt and review of Arrow's reply to garnishment Answer.	250.00	0.80	200.00
	For Current Services Rendered		9.70	2,425.00

Southern Sky Air & Tours, LLC

Page: 2

March 31, 2011

Client Matter No: 1639-102M

Statement No: 157346

Arrow Energy, Inc. (Garnishment)

	Recapitulation			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>	
Robert M. Dees	9.70	\$250.00	\$2,425.00	

Expenses

Long distance telephone charges	20.80
Photocopy charges	3.60
Postage	1.83
Total Expenses Through 03/31/2011	26.23

Advances

Online legal research	30.64
Total Advances Through 03/31/2011	30.64

Total Current Work	2,481.87
--------------------	----------

Balance Due	<u>\$2,481.87</u>
-------------	-------------------

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.
14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
April 30, 2011
Client Matter No: 1639-102M
Statement No: 157864

Attn: Kay Ellison

Arrow Energy, Inc. (Garnishment)

Fees

			Rate	Hours	
04/06/2011	RMD	Emails with Arrow's attorney; emails with R. Boyd; telephone conference with R. Boyd.	250.00	0.70	175.00
04/07/2011	RMD	Emails with AFI's attorney; emails with Arrow's attorney; telephone conference with Arrow's attorney; emails with R. Boyd.	250.00	0.80	200.00
04/11/2011	RMD	Receipt and review of Arrow's Motion for Entry of Final Judgement in Continuing Garnishment; emails with R. Boyd.	250.00	0.60	150.00
04/14/2011	RMD	Telephone conference with with R. Boyd; emails with R. Boyd.	250.00	0.40	100.00
04/15/2011	RMD	Emails with R. Boyd; telephone conference with R. Boyd.	250.00	0.30	75.00
04/18/2011	RMD	Telephone conference with R. Boyd; emails with R. Boyd; research wire transfer issue.	250.00	0.80	200.00
04/19/2011	RMD	Research wire transfer cancellation issues; telephone conference with R. Boyd; emails with R. Boyd.	250.00	2.40	600.00
04/20/2011	RMD	Research for Motion to Amend Answer to Writ of Garnishment; preparation of Motion to Amend Writ of Garnishment; preparation of proposed Amended Answer; e-mails with R. Boyd; receipt and review of Brendan Airways Complaint.	250.00	4.80	1,200.00
04/21/2011	RMD	Preparation of Motion to Amend Garnishment answer; preparation of proposed amended answer.	250.00	1.10	275.00

Southern Sky Air & Tours, LLC

Page: 2
April 30, 2011

Client Matter No: 1639-102M
Statement No: 157864

Arrow Energy, Inc. (Garnishment)

		Rate	Hours	
04/22/2011	RMD Telephone conference with R. Boyd; e-mails with R. Boyd.	250.00	0.40	100.00
04/25/2011	RMD Preparation of Motion to Amend Garnishment answer; telephone conference with Arrow's attorney; emails with R. Boyd.	250.00	1.30	325.00
04/26/2011	RMD Telephone conference with Arrow's attorney; brief garnishment research.	250.00	1.20	300.00
04/27/2011	RMD Emails with R. Boyd; emails with K. Ellison; preparation for hearing on Arrow's Motion for Entry of Judgement.	250.00	1.80	450.00
04/28/2011	RMD Preparation for and attendance in Ft. Lauderdale at hearing on Arrow's Motion for Entry of Judgement Against Garnishee.	250.00	6.30	1,575.00
04/29/2011	RMD Telephone conference with Arrow's attorney.	250.00	0.40	100.00
04/30/2011	RMD Telephone conference with with R. Boyd.	250.00	0.30	75.00
	For Current Services Rendered		23.60	5,900.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	23.60	\$250.00	\$5,900.00

Expenses

Tolls/Taxi/Auto Rental	139.77
Long distance telephone charges	48.24
Photocopy charges	21.60
Postage	6.24
Airfare	359.40
Total Expenses Through 04/30/2011	575.25

Advances

Online legal research	70.81
Total Advances Through 04/30/2011	70.81
Total Current Work	6,546.06

Southern Sky Air & Tours, LLC

Page: 3

April 30, 2011

Client Matter No: 1639-102M

Statement No: 157864

Arrow Energy, Inc. (Garnishment)

Previous Balance	\$2,481.87
------------------	------------

Payments

04/19/2011	Advance Payment (Clerk Payment Re: Writ)	-30.64
04/19/2011	Expense Payment (Clerk Payment Re: Writ)	-26.23
04/19/2011	Fee Payment (Clerk Payment Re: Writ)	-43.13
	Total Payments	-100.00
	Balance Due	<u>\$8,927.93</u>

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.
14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Attn: Kay Ellison

Page: 1
May 31, 2011
Client Matter No: 1639-102M
Statement No: 158267

Arrow Energy, Inc. (Garnishment)

Fees

		Rate	Hours	
05/02/2011	RMD Preparation of Amended Motion to amend answer to Writ of Garnishment; emails with Arrow's attorney; emails with R. Boyd.	250.00	2.20	550.00
05/03/2011	RMD Telephone conference with R. Boyd; emails with R. Boyd; emails with Arrow's attorney.	250.00	0.70	175.00
05/04/2011	RMD Telephone conference with R. Boyd.	250.00	0.20	50.00
05/05/2011	RMD Emails with R. Boyd; revised amended Motion to Amend Garnishment answer.	250.00	0.60	150.00
05/06/2011	RMD E-mails with R. Boyd.	250.00	0.20	50.00
05/09/2011	RMD E-mails with R. Boyd.	250.00	0.20	50.00
05/11/2011	RMD E-mails with J. Tull; e-mails with R. Boyd; e-mail to Arrow's attorney.	250.00	0.40	100.00
05/13/2011	RMD E-mails with R. Boyd; e-mails with Arrow's attorney.	250.00	0.40	100.00
05/17/2011	RMD E-mails with R. Boyd.	250.00	0.40	100.00
05/26/2011	RMD Receipt and review of e-mail from Arrow's attorney attaching final judgment signed on April 28, 2011; brief appellate research; telephone conference with R. Boyd; preparation of Notice of Appeal.	250.00	1.30	325.00
05/31/2011	RMD Conference call with R. Boyd, J. Tull and K. Ellison;			

Southern Sky Air & Tours, LLC

Page: 2

May 31, 2011

Client Matter No: 1639-102M

Statement No: 158267

Arrow Energy, Inc. (Garnishment)

	Rate	Hours	
preparation of Motion to Relinquish Jurisdiction.	250.00	1.40	350.00
For Current Services Rendered		8.00	2,000.00

	Recapitulation			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>	
Robert M. Dees	8.00	\$250.00	\$2,000.00	

Expenses

Tolls/Taxi/Auto Rental	49.88
Overnight Delivery	13.50
Long distance telephone charges	27.89
Photocopy charges	2.40
Postage	0.88
Meals	22.74
Parking	16.00
Total Expenses Through 05/31/2011	133.29

Advances

Clerk of Court	400.00
Total Advances Through 05/31/2011	400.00
Total Current Work	2,533.29
Previous Balance	\$8,927.93
Balance Due	<u>\$11,461.22</u>

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.
14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
June 30, 2011
Client Matter No: 1639-102M
Statement No: 158825

Attn: Kay Ellison

Arrow Energy, Inc. (Garnishment)

Fees

		Rate	Hours	
06/01/2011	RMD Telephone conferences with R. Boyd; preparation of Motion to Relinquish Jurisdiction.	250.00	1.40	350.00
06/02/2011	RMD Revised Motion to Relinquish Jurisdiction; e-mails with Arrow's attorney.	250.00	1.50	375.00
06/03/2011	RMD Preparation of Motion Relinquish Jurisdiction; e-mails with Arrow's attorney.	250.00	0.80	200.00
06/08/2011	RMD Preparation of Motion to Relinquish Jurisdiction; e-mails with Arrow's attorney.	250.00	2.00	500.00
06/09/2011	RMD Preparation of Motion to Relinquish Jurisdiction; e-mails with Arrow's attorney; e-mails with R. Boyd.	250.00	1.60	400.00
06/14/2011	HD Preparation of Docketing Statement.	125.00	0.50	62.50
06/16/2011	RMD Preparation of docketing statement.	250.00	0.30	75.00
06/17/2011	RMD Receipt and review of notice from clerk; e-mails with Arrow's attorney; e-mails with R. Boyd.	250.00	0.40	100.00
06/20/2011	RMD Preparation of docketing statement for appeal.	250.00	0.30	75.00
06/22/2011	RMD Review 4th District Court of Appeal docket; e-mail to R. Boyd; begin preparation of Motion for Rehearing.	250.00	1.00	250.00
06/27/2011	RMD Receipt and review of Order granting our Motion to Relinquish Jurisdiction; review Request for Production; e-mail			

Southern Sky Air & Tours, LLC

Page: 2

June 30, 2011

Client Matter No: 1639-102M

Statement No: 158825

Arrow Energy, Inc. (Garnishment)

		Rate	Hours	
	to R. Boyd.	250.00	0.70	175.00
06/28/2011	RMD Preparation of Motion for Rehearing; receipt and review of fuel audit spreadsheets; telephone conference with Arrow's attorney.	250.00	1.50	375.00
06/29/2011	RMD Preparation for Motion for Rehearing; telephone conference with K. Ellison; conference call with K. Ellison, J. Tull and R. Boyd; receipt and review of documents from R. Boyd; preparation of discovery responses.	250.00	3.80	950.00
06/30/2011	RMD Review documents and preparation of response to Arrow's Request for Production; telephone conference with Arrow's attorney; e-mails with Arrow's attorney; preparation of Motion for Rehearing.	250.00	4.30	1,075.00
	For Current Services Rendered		20.10	4,962.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	19.60	\$250.00	\$4,900.00
Heather Durham	0.50	125.00	62.50

Expenses

Long distance telephone charges	80.92
Photocopy charges	25.40
Postage	7.36
Total Expenses Through 06/30/2011	113.68

Advances

Clerk of Court	174.80
Online legal research	44.39
Total Advances Through 06/30/2011	219.19

Total Current Work	5,295.37
--------------------	----------

Previous Balance	\$11,461.22
------------------	-------------

Balance Due	<u>\$16,756.59</u>
-------------	--------------------

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.

14 East Bay Street
Jacksonville, Florida 32202
Phone: (904) 357-3660
Facsimile: (904) 357-3661

Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Attn: Kay Ellison

Page: 1
July 31, 2011
Client Matter No: 1639-102M
Statement No: 159221

Arrow Energy, Inc. (Garnishment)

Fees

		Rate	Hours	
07/01/2011	RMD Preparation of affidavit of R. Rose; preparation of Motion for Rehearing; e-mails with K. Ellison; e-mails with R. Rose; telephone conference with R. Rose.	250.00	4.20	1,050.00
07/06/2011	RMD E-mails with AFI's attorney.	250.00	0.60	150.00
07/07/2011	RMD Preparation for hearing on our Motion for Rehearing.	250.00	0.70	175.00
07/08/2011	RMD E-mails with Arrow's attorney; preparation for hearing on our Motion for Rehearing.	250.00	1.30	325.00
07/11/2011	RMD Preparation for hearing on our Motion for Rehearing.	250.00	0.70	175.00
07/14/2011	RMD Preparation for hearing on our Motion for Rehearing.	250.00	0.80	200.00
07/19/2011	RMD Telephone conference with R. Boyd; e-mail to R. Boyd; preparation for hearing on our Motion for Rehearing.	250.00	0.70	175.00
07/20/2011	RMD Letter to Judge; preparation for hearing on our Motion for Reconsideration.	250.00	0.70	175.00
07/21/2011	RMD Telephone conference with R. Boyd; preparation for hearing on our Motion for Rehearing.	250.00	0.60	150.00
07/22/2011	RMD E-mails with R. Boyd; preparation of Motion to Amend Garnishment Answer; preparation of Amended Answer.	250.00	1.40	350.00
07/28/2011	RMD Receipt and review of affidavit of S. Wagner; preparation for hearing on our Motion for Rehearing; e-mails with R. Rose.	250.00	1.30	325.00

Southern Sky Air & Tours, LLC

Page: 2

July 31, 2011

Client Matter No: 1639-102M

Statement No: 159221

Arrow Energy, Inc. (Garnishment)

		Rate	Hours	
07/29/2011	RMD Preparation for hearing on our Motion for Rehearing; receipt and review of Arrow's affidavit and memo in opposition to our Motion for Rehearing.	250.00	2.20	550.00
	For Current Services Rendered		15.20	3,800.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	15.20	\$250.00	\$3,800.00

Expenses

Overnight Delivery	19.33
Overnight Delivery	18.47
Long distance telephone charges	25.71
Photocopy charges	43.60
Postage	10.28
Airfare	379.40
Total Expenses Through 07/31/2011	496.79

Advances

Clerk of Court	45.70
Online legal research	131.08
Total Advances Through 07/31/2011	176.78

Total Current Work	4,473.57
--------------------	----------

Previous Balance	\$16,756.59
------------------	-------------

Balance Due	<u>\$21,230.16</u>
-------------	--------------------